

STATE OF NEVADA  
PUBLIC UTILITIES COMMISSION OF NEVADA

1150 East William Street  
Carson City, Nevada 89701-3109  
Policy (775) 687-6007 • Fax (775) 687-6110  
Staff (775) 687-6001 • Fax (775) 687-6120

RURAL NEVADA  
557 W. Silver Street, No. 207  
Elko, Nevada 89801  
(775) 738-4914 • Fax (775) 778-6928



SOUTHERN NEVADA OFFICE  
555 E. Washington Avenue, No. 4500  
Las Vegas, Nevada 89101  
(702) 486-2600 • Fax (702) 486-2595

April 12, 1999

DOCKET FILE COPY ORIGINAL

RECEIVED

APR 13 1999

CC MAIL ROOM

Magalie Roman Salas  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: CC Docket No. 96-98 Implementation of the Local Competition Provisions in the  
Telecommunications Act of 1996

CC Docket No. 99-68, File NSD-L-98-121 In the Matter of Pacific Bell and Nevada  
Bell's Request for Waiver of the Implementation Date until June 15, 1999, for  
IntraLATA Toll Dialing Parity

To the Secretary:

Enclosed herewith for filing with the Commission are an original plus four copies of the  
Comments of the Public Utilities Commission of Nevada for filing in the above-captioned  
matters.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff E. Parker", is written over a horizontal line.

JEFF E. PARKER  
General Counsel

JEP/md

Encls.

No. of Copies rec'd  
List ABCDE

044

RECEIVED  
APR 13 1999  
FCC MAIL ROOM

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

In the Matter of

Pacific Bell and Nevada Bell's Request  
for Waiver of the Implementation Date  
Until June 15, 1999 for IntraLATA Toll  
Dialing Parity

)  
)  
)  
)  
)  
)

File No. NSD-L-98-121  
CC Docket 96-98

**COMMENTS OF THE PUBLIC UTILITIES COMMISSION OF NEVADA**

On April 2, 1999, Pacific Bell and Nevada Bell filed a Petition with the Federal Communications Commission ("FCC or Commission") for a waiver of the May 7, 1999 date for intraLATA toll dialing parity implementation. In its request Nevada Bell asked that the date for implementation be extended until June 15, 1999.

The Public Utilities Commission of Nevada ("PUC of Nevada") appreciates the opportunity to comment on this Petition.

Nevada Bell's intraLATA toll dialing parity implementation plan was approved by the PUC of Nevada on May 12, 1997.

We believe that a "realistic choice" for customers of intraLATA toll to be available to customers as soon as possible has merit and should be considered carefully by the Commission.

Competition in local services and intraLATA services is in the public interest and should not be delayed at the requests of LECs. The PUC of Nevada encourages the Commission to make a "common sense" judgment about the public interest merits of this issue.

Nevada Bell has agreed, in a docket pending before the PUC of Nevada (Docket No.98-11010), to implement intraLATA toll dialing parity no later than June 15, 1999. However, as reflected in the record developed before the PUC of Nevada, Nevada Bell was aware, at the time it made this commitment, that the FCC might require an earlier implementation date. Nevada Bell made no argument with respect to why an earlier date

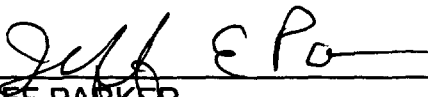
which might be chosen by the FCC should be extended.

The PUC of Nevada encourages the FCC to act in accordance with the implementation schedule it has chosen, and require Nevada Bell to implement intraLATA toll dialing parity no later than May 7, 1999, and deny Nevada Bell's request for any extension past May 7, 1999.

**Conclusion:**

For the reasons set forth in these Comments, the PUC of Nevada respectfully recommends that the FCC issue an Order denying Nevada Bell's request for an extension of time for implementing intralata toll dialing parity and order Nevada Bell to implement intralata toll dialing parity as soon as possible and not to exceed the FCC's date of May 7, 1999, stated in the FCC's March 23, 1999, Order.

Respectfully submitted, this 12<sup>th</sup> day of April 1999.

  
JEFF PARKER  
General Counsel  
PUBLIC UTILITIES COMMISSION OF NEVADA  
1150 E. William Street  
Carson City, NV 89701-3109  
Telephone: (775) 687-6008

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of the Public Utilities Commission of Nevada and that I have served copies of the foregoing comments of the Public Utilities Commission of Nevada in CC Docket 96-98, File NSD-L-98-121 upon the following:

MAGALIE ROMAN SALAS, SECRETARY  
FEDERAL COMMUNICATIONS COMMISSION  
PORTALS II  
445 12TH STREET, S.W. SUITE TW-A325  
WASHINGTON, DC 20554

AL McCLOUD  
PORTALS II  
NETWORK SERVICES DIVISION  
445 12TH STREET, S.W. SUITE 6-A320  
WASHINGTON, DC 20554

INTERNATIONAL TRANSCRIPTION SERVICE  
1231 20TH STREET, N.W.  
WASHINGTON, DC 20036

NEVADA BELL  
ROOM C144  
645 E. PLUMB LANE  
RENO, NV 89520

DATED this 12<sup>th</sup> day of April, 1999.

  
MARY K. DREESON